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January 23, 2023

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Bausch Health Ireland Limited, et al. v. Taro Pharmaceuticals Inc., et al.
Civil Action No. 22-4670 (SRC) (CLW)

Dear Judge Waldor:

This firm represents Plaintiffs in the above-referenced matter. We write, jointly with counsel for Defendants, to respectfully request an extension of the following case deadlines due to upcoming conflicts of counsel for Plaintiffs and Defendants.

Event	Current Deadline (ECF Nos. 22, 30)	Proposed Amended Deadline
Plaintiffs' Disclosure of Asserted Claims and Infringement Contentions and attendant document production (L. Pat. R. 3.6(g)-(h)) and Plaintiffs' Responses to Invalidity Contentions (L. Pat. R. 3.6(i))	January 30, 2023	February 28, 2023
Exchange of Proposed Terms for Claim Construction (L. Pat. R. 4.1(a))	February 6, 2023	March 13, 2023
Exchange of Preliminary Claim Construction and Extrinsic Evidence (L. Pat. R. 4.2(a)-(b))	February 20, 2023	March 27, 2023
Identification of all intrinsic and extrinsic evidence that each party intends to rely on to oppose the other party's claim construction (L. Pat. R. 4.2(c))	March 13, 2023	April 13, 2023
Submission of Joint Claim Construction and Prehearing Statement (L. Pat. R. 4.3)	April 12, 2023	May 12, 2023

If these extensions are acceptable to the Court, we respectfully request that the Court "So Order" this letter. We thank the Court for its time and attention to this matter and are available at the Court's convenience to address any questions or concerns.

Respectfully submitted,

SO-ORDERED:

s/ William P. Deni, Jr.
William P. Deni, Jr.

January 24, 2023

/s/ Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.

cc: All counsel of record (via ECF)